

20<sup>th</sup> November 2018

██████████  
Senior Planning Technical Officer  
Fermanagh & Omagh District Council  
Omagh

**PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER NORTHERN IRELAND  
2015**

**THE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS (NORTHERN  
IRELAND) 2015 (“the EIA REGULATIONS”)**

Dear ██████████

Dalradian Gold Ltd (DGL) is submitting this notification in relation to mineral exploration activities associated with its Mineral Prospecting Licences DG1, DG2, DG3, DG4, DG5 & DG6 in Counties Tyrone and Londonderry. We seek a determination that the development is not EIA development, and this letter also serves as the Notification required under Part 16 of the Planning (General Development) Order (Northern Ireland) 2015 which relates to permitted development rights for mineral exploration. The Department for Economy (DfE), and the Health and Safety Executive Northern Ireland (HSENI) have also been notified in relation to this development.

**PART 16 OF THE PLANNING (GENERAL PERMITTED DEVELOPMENT)  
ORDER (NORTHERN IRELAND) 2015**

Class A under Part 16 permits ‘development on any land, during a period not exceeding 4 months, consisting of:

- (a) The drilling of boreholes;
- (b) The carrying out of seismic surveys; or
- (c) The making of other excavations;

for the purpose of mineral exploration, and the provision or assembly on that land or adjoining land of any structure required in connection with any of those operations.’

**NOTIFICATION**

The development will comply with the conditions set out under Section A.1 of Part 16

**A.1 (a)** In compliance with Section A.1 of Part 16 this notification provides details of the development in writing.

A map is provided in Enclosure A showing the location of the proposed drill pad locations. The table below summarises the approximate locations, depths, commencement date/time-scales, and the target minerals for the works.

Drill Pad ID	Coordinates <sup>1</sup>		Anticipated Depth <sup>2</sup>	Anticipated Timeframe <sup>3</sup>		Target Minerals
	Easting	Northing		Start	Finish	
IND1_P1_H1	256580.8	386712.3	254	10/01/2019	22/01/2019	Precious and Base Metals
IND1_P2_H1	256647.4	386731.1	275	24/01/2019	06/02/2019	Precious and Base Metals
IND1_P2_H2	256647.4	386731.1	275	07/02/2019	20/02/2019	Precious and Base Metals
IND1_P3_H1	256732.8	386678.7	290	22/02/2019	08/02/2019	Precious and Base Metals
IND1_P3_H2	256732.8	386678.7	292	09/03/2019	23/03/2019	Precious and Base Metals
IND1_P3_H3	256732.8	386678.7	289	24/03/2019	06/04/2019	Precious and Base Metals
IND1_P4_H1	256579.0	386558.0	227	10/01/2019	20/01/2019	Precious and Base Metals
IND1_P5_H1	256628.1	386599.6	220	22/01/2019	01/02/2019	Precious and Base Metals
IND1_P5_H2	256628.1	386599.6	486	02/02/2019	23/02/2019	Precious and Base Metals
IND1_P6_H1	256687.0	386589.5	230	27/03/2019	06/04/2019	Precious and Base Metals
IND1_P6_H2	256687.0	386589.5	476	07/04/2019	30/04/2019	Precious and Base Metals
IND1_P7_H1	256739.0	386477.0	420	08/04/2019	28/04/2019	Precious and Base Metals
IND1_P7_H2	256739.0	386477.0	98	30/04/2019	04/05/2019	Precious and Base Metals
IND1_P8_H1	256654.3	386414.6	253	10/01/2019	22/01/2019	Precious and Base Metals
IND1_P8_H2	256654.3	386414.6	280	23/01/2019	05/02/2019	Precious and Base Metals
IND1_P9_H1	256588.0	386321.2	246	21/02/2019	04/03/2019	Precious and Base Metals
IND1_P10_H1	256623.3	386252.9	126	06/03/2019	11/03/2019	Precious and Base Metals
IND1_P11_H1	256576.0	386203.1	145	12/02/2019	19/02/2019	Precious and Base Metals

IND1_P12_H1	256515.7	386137.0	72	07/02/2019	10/02/2019	Precious and Base Metals
IND1_P13_H1	256684.9	386199.3	153	13/03/2019	20/03/2019	Precious and Base Metals
IND1_P13_H2	256684.9	386199.3	102	21/03/2019	25/03/2019	Precious and Base Metals
IND1_P14_H1	256855.7	386549.9	212	29/03/2019	08/04/2019	Precious and Base Metals
IND1_P15_H1	256853.8	386599.4	255	15/03/2019	27/03/2019	Precious and Base Metals
IND1_P16_H1	256845.0	386770.1	363	24/02/2019	13/03/2019	Precious and Base Metals

<sup>1</sup>Locations may change +/- 75 metres depending on ground conditions at the time of commencement of installation of the drill pad. Final location will maintain all required standoff distances as required by the water features and ecological surveys.

<sup>2</sup>The final depth of hole will depend on whether or not target minerals were intersected towards the end of hole. Any continued drilling passed the anticipated depth will not affect the conclusions of the supporting information supplied.

<sup>3</sup>Earliest anticipated start date. All start dates subject to drill rig availability/progress.

The exploration program presented is designed to target precious and base metals and gather geotechnical and geological data. Consistent with previous exploration drilling in other areas of our licence, plant will comprise an industry standard rotary core drilling rig which will be used to obtain continuous rock core over the depth of the boreholes. A description of the rigs or similar to that planned for this work is provided in Enclosure B. Dalradian have an option of using lighter rigs where necessary which is subject to ground conditions. These rigs are comparatively light weight and deemed to be most suitable for some working areas.

A closed loop zero discharge system will be used for the management of drill return water, with all water stored in above ground tanks/containers or a tanker. At the conclusion of drilling at each site or when the drilling fluid is spent, all drill returns will be trucked offsite by a licenced carrier, and disposed of at an appropriate licenced facility. Enclosure C presents a full Project Description for the exploration drilling demonstrating how the process is managed to prevent any discharges to the environment. Drill site inspections will occur on a daily basis and the monitoring of drilling returns supervised continuously.

A Water Features Survey has been completed covering the area of proposed mineral exploration (Enclosure D). All drill pads are located greater than 10m from the nearest identified surface water feature. According to the Northern Ireland Flood Map none of the drill pads are located within an area subject to flooding.

**A.1 (b)** The boreholes are not located within any area of special scientific interest or site of archaeological interest.

Enclosure E presents an Ecological Impact Assessment (EcIA) and information to inform a Habitat Regulations Assessment (HRA). Both reports assess the implications of any exploration drilling on the ecological features and European sites respectively. The assessments found that the

proposed exploration drilling operations will not have any significant impact on any statutory or non-statutory designated site.

A separate Archaeological and Cultural Assessment (Enclosure F) has been submitted as part of the submission. It concluded that the proposed works are located in an area of low archaeological potential and that no further archaeological input is required to facilitate the site investigation works.

**A.1 (c)** The development does not require the use of any explosives.

**A.1 (d)** The development is not located within 3 kilometres of an aerodrome.

The development will comply with the conditions set out under Section A.2 of Part 16 of the General Development Order:

**A.2 (a)** The development shall be carried out in accordance with the details contained in this notification.

**A.2 (b)** No trees on the land shall be removed or damaged.

**A.2 (c)** The proposed mineral exploration work relates to the drilling and assessment of boreholes only and no construction or excavations will take place. If any element of topsoil is disturbed as part of site setup (i.e. rig stability considerations) then this process will follow good practice. No vegetation will be stripped, sods will be kept as intact as possible and kept moist (if considered appropriate), and short term storage of site specific materials only will take place adjacent to the drill pad.

Existing access tracks (see Enclosure A) will be utilised during the permitted development activities. Thereafter, pads will require temporary trafficking over surrounding land. The use of tracked rigs with increased weight distribution and reduced disturbance has previously proved successful for this purpose, and DGL have several rig options in this respect. If at the time of drilling the final access approach is considered to be problematic then a temporary floating road or bog mats may be installed locally to support transit above the existing ground surface. Any floating road is expected to initially include placement of a Terram Ground Stabilisation Geosynthetic (or similar) and overlying locally sourced rock fill or bog mats, appropriate. No ground will be excavated during access.

**A.2 (d)** Drill pad restoration will be carried out as soon as possible after completion of drilling works and certainly within a period of 28 days, unless otherwise agreed in writing with DfE. Restoration will consist of removing any plant, the collar from the drill hole, any floating road/bog mats and materials and wastes (including drill cuttings and water) from the area of works. In addition, the borehole will be adequately sealed and any pad specific topsoil and associated vegetation replaced in order to return the area of works to its former condition. Ground elevation profiles will reflect those prior to drilling.

Sealing the borehole includes inserting a Van Ruth plug into the open hole at approximately 15m into the bedrock, and thereafter cementing the hole from the Van Ruth to the bedrock surface. This process will prevent longer term pathways from overlying surficial materials.

**THE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS (NORTHERN IRELAND) 2015**

The surface area of each drill pad or borehole site can be defined as the ‘area of works’ as described in Schedule 2 of the EIA Regulations as:

*‘includes any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps or other facilities or stores required for construction or installation’.*

Although the proposed exploration boreholes fall within an Area of Outstanding Natural Beauty it is considered that they do not constitute EIA development.

Each drill pad site is to be fenced off at approximately 200 m<sup>2</sup>. Collectively the drill pads proposed are well below the Part 2(d) of Schedule 2 ‘Extractive Industry’ threshold, i.e. deep drillings where the area of works exceeds 1 hectare (10,000 m<sup>2</sup>). In any event, the drilling proposed is not considered to constitute ‘deep drilling’ as defined in the EIA Directive and the 2015 EIA Regulations. The Department’s current EIA guidance does not refer to ‘deep drilling’, however previous guidance contained in Development Control Advice Note (DCAN) 10 paragraph A9 (1999) states:

*“EIA is more likely to be required where the scale of the drilling operations involves development of a surface site of more than 5 hectares. Regard should be had to the likely wider impacts on surrounding hydrology and ecology. On its own, exploratory deep drilling is unlikely to require EIA. It would not be appropriate to require EIA for exploratory activity simply because it might eventually lead to some form of permanent activity.”*

It is considered that the proposed exploration boreholes do not constitute EIA development.

All of the exploratory drilling proposed by this notification will take place within the hours of 7am and 7pm and will be situated on and accessed utilising the approvals of relevant consenting landowners.

Formal drill site inspection will occur on a daily basis, and continuous monitoring will also take place. Additionally, the DGL Environmental Manager will periodically inspect the drilling works and the final restoration to ensure the program is completed on time and to a high standard.

Consistent with all DGL field operations, exploration drilling will adopt ‘good site practice’ in terms of noise mitigation. In addition to the short term nature of the development, measures employed will include:

- Use of noise curtains on the drill rig;
- Mobile plant visiting any area of works will enter in a circular pattern to minimise, as far as is practical and safe, noise from reverse warning systems;
- All plant will be operated in a proper manner with respect to minimizing noise emissions, for example minimisation of drop heights and no un-necessary engine revving;
- Plant will be subject to regular maintenance. All plant will be fitted with effective silencers and will be maintained in good working order to meet manufacturers’ noise rating levels. Defective silencers will be replaced immediately; and
- Plant that is used intermittently will be shut down when not in use.

Please contact us if you have any queries regarding this notification and we look forward to receiving your formal determination pursuant to Regulation 5 of the 2015 EIA Regulations that the proposed works do not constitute EIA development.

Yours sincerely,

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[Redacted]  
[Redacted]

Cc. [Redacted]

- Enclosure A. Location of proposed mineral exploration drilling
- Enclosure B. Detailed description of drill rig
- Enclosure C. Project Description
- Enclosure D. Water Features Survey
- Enclosure E. Ecological Surveys
- Enclosure F. Archaeological & Cultural Heritage Assessment